

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Mooresville Regional Office
County: Stanly
NC Facility ID: 8400012
Inspector's Name: Matthew J. Wilson
Date of Last Inspection: 01/07/2016
Compliance Code: 3 / Compliance - inspection

<p align="center">Facility Data</p> <p>Applicant (Facility's Name): Michelin Aircraft Tire Company</p> <p>Facility Address: Michelin Aircraft Tire Company 40589 South Stanly School Road Norwood, NC 28128</p> <p>SIC: 3011 / Tires And Inner Tubes NAICS: 326211 / Tire Manufacturing (except Retreading)</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p align="center">Permit Applicability (this application only)</p> <p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
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Contact Data			Application Data
<p align="center">Facility Contact</p> <p>William (Brad) Hinchman RGEP (704) 474-7774 40589 South Stanly School Road Norwood, NC 28123</p>	<p align="center">Authorized Contact</p> <p>Preston Gray Facility Site Manager (704) 474-7757 40589 South Stanly School Road Norwood, NC 28128</p>	<p align="center">Technical Contact</p> <p>Heather Ashby Environmental Manager (704) 474-7774 40589 South Stanly School Road Norwood, NC 28128</p>	<p>Application Number: 8400012.15A Date Received: 08/26/2015 Application Type: Renewal Application Schedule: TV-Renewal</p> <p align="center">Existing Permit Data</p> <p>Existing Permit Number: 05835/T18 Existing Permit Issue Date: 06/21/2011 Existing Permit Expiration Date: 05/31/2016</p>

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	1.70	8.11	55.51	4.52	2.97	1.57	0.2421 [MIBK (methyl isobutyl ketone)]
2013	0.0400	6.37	82.60	4.27	2.62	1.62	0.2544 [MIBK (methyl isobutyl ketone)]
2012	0.5500	7.65	50.86	4.53	1.17	1.61	0.2248 [MIBK (methyl isobutyl ketone)]
2011	0.3000	5.41	50.94	4.34	1.21	1.57	0.2238 [MIBK (methyl isobutyl ketone)]
2010	0.0900	7.26	47.42	5.92	1.16	1.31	0.1885 [MIBK (methyl isobutyl ketone)]

<p>Review Engineer: David Hughes</p> <p>Review Engineer's Signature: Date:</p>	<p align="center">Comments / Recommendations:</p> <p>Issue 05835/T19 Permit Issue Date: Permit Expiration Date:</p>
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I. Purpose of Application

This permitting action is for renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**05835T18**) was issued on **June 21, 2011**, with an expiration date of **May 31, 2016**. The renewal application was received on **August 31, 2015**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied or the eclipse of the original expiration date, whichever is earlier.

II. Facility Description

The facility is an aircraft tire manufacturer.

III. History/Background/Application Chronology

September 5, 2002 – Permit **05835T13** issued as a first-time Title V permit.

October 31, 2006 – Permit **05835T14** issued as a Title V renewal.

February 8, 2007 – Permit **05835T15** issued as an administrative amendment.

March 6, 2008 – Permit **05835T16** issued as a name change.

August 30, 2010 – Permit **05835T17** issued as a minor modification for new retreading operation (**ID No. ES-13**).

June 21, 2011 – Permit **05835T18** issued as a Title V renewal.

July 30, 2013 – NOD was issued for a record keeping violation 02D .0958: Work Practices for Sources of Volatile Organic Compounds. No enforcement action was taken.

February 10, 2014 – NOV was issued for a record keeping violation 02D .0958: Work Practices for Sources of Volatile Organic Compounds. No enforcement action was taken.

March 26, 2015 – NOV was issued for a procedural violation of 02D .1111 Maximum Achievable Control Technology. No enforcement action was taken.

August 31, 2015 – Permit application 8400012.15B received as a Title V permit renewal application. The application was deemed complete for processing.

January 7, 2016 – MRO completed annual facility inspection.

September 15, 2016 - Responsible Official Shannon Bernhardt sent an e-mail to David B. Hughes stating that the emergency generator (ES-5) has been decommissioned and Michelin Aircraft Tire Company, LLC and would like it removed from the Permit.

September 16, 2016 – Heather Ashby e-mailed David B. Hughes the Application For Registration form complete with the new Responsible Official/Authorized and Facility/Inspection Contact information.

XXXX XX, 2016 – DRAFT permit sent to Permittee and MRO for comment prior to public notice and EPA review. The Permittee provided comments on draft permit and review via phone conversation on **August 31, 2016**. No comments were received from MRO.

XXXX XX, 2016 – DRAFT permit sent to 30-day public notice and 45-day EPA review. The 30-day public review period ended **XXXX XX, 2016** with the receipt of no comments. The 45-day EPA review period ended **XXXX XX, 2021** with the receipt of no comments.

IV. Permit Modifications/Changes and TVEE Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page No.	Section	Description of Change
Cover	-	-amended all dates and permit revision numbers
All	Header	-amended permit revision number
3	Section 1 (table)	-updated number of tire building machines from thirty-eight to twenty-four per Permittee request
3	Section 1 (table)	-removed emergency generator (ES-5). It has been decommissioned according to Permittee
4	2.1 A	-updated number of tire building machines from thirty-eight to twenty-four per Permittee request
12	2.1 D.5	-updated shell language for MACT (Subpart JJJJJ)
14	2.1 E (old)	-removed emergency generator (ES-5). It has been decommissioned according to Permittee
25	2.2 A	-updated number of tire building machines from thirty-eight to twenty-four per Permittee request
29-39	General Conditions	-updated shell conditions (v4.0 12/17/15)
40	List of Acronyms	-updated to current list of acronyms

There were only minor, non-significant modifications to the equipment descriptions needed in the Title V Equipment Editor (TVEE).

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 02D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources
15A NCAC 02D .0521, Control of Visible Emissions
15A NCAC 02D .0524, New Source Performance Standards (40 CFR 60, Subpart BBB)
15A NCAC 02D .0958, Work Practices for Sources of Volatile Organic Compounds
15A NCAC 02D .1100, Control of Toxic Air Pollutants
15A NCAC 02Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)
15A NCAC 02Q .0711, Emission Rates Requiring a Permit

A regulatory review for these current permit conditions will not be included in this document. However, as part of this permit renewal, applicability of the current sources to area source GACT requirements of 40 CFR 63 was evaluated. The facility operates two natural gas/No. 6 fuel oil fired boilers (ID Nos. ES-4A and ES-4B). These permitted sources are subject to 15A NCAC 02D .1111 (40 CFR 63, Subpart JJJJJ) as discussed in Section VI of this Document below.

The diesel-fired emergency generator (ID No. ES-5) has been decommissioned and is being removed from Air Permit No. 005835T19. Michelin Aircraft Tire Company has informed the Division of Air Quality (DAQ) that the fuel and battery for the generator have been removed and the lines have been capped off. The generator has not been used since June 2015 and there are no plans to use the emergency generator in the future.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The Permittee operates two green tire spray booths (**ID Nos. ES-2**) subject to New Source Performance Standards (40 CFR 60, Subpart BBB) for the Rubber Tire Manufacturing Industry. Volatile organic compounds from these sources are limited to 1.2 grams of VOC per tire sprayed with an inside green tire spray per month and 9.3 grams of VOC per tire sprayed with an outside green tire spray per month. To ensure compliance (per 60.543(b)(4)), the Permittee is limited to using water based sprays containing less than 1 percent by weight of VOC. The Permittee is required to maintain records of spray formulations or Method 24 analysis conducted to verify VOC content. Semiannual reporting of these records is required. This permit renewal does not affect this status.

As discussed below, the Permittee has indicated that it now operates one propane-fired emergency generator (**ID No. I-EG1**). This source is subject to NSPS for new spark ignition stationary internal combustion engines (40 CFR 60, Subpart JJJJ) by virtue of its requirement to comply with the area source GACT (40 CFR 63, Subpart ZZZZ). Compliance with ZZZZ is indicated through compliance with the NSPS. The following summarizes the requirements of this generator under the NSPS (Note. language has been tailored to only include requirements for certified engines. It is assumed that the Permittee has chosen to purchase a certified engine for compliance purposes.):

60.4233 – What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?

(d) Owners and operators of stationary SI ICE with a maximum engine power greater than 19kW (25 Hp) and less than 75 kW (100 Hp) must comply with the emission standards in Table 1 of this Subpart for their emergency stationary SI ICE (from Table 1: NO_x = 10 g/HP-hr and CO = 387 g/HP-hr).

60.4234 – How long must I meet the emission standards if I am the owner or operator of a stationary SI internal combustion engine?

Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in 60.4233 over the entire life of the engine.

60.4237 – What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?

(c) If you are the owner or operator of an emergency stationary SI ICE that is less than 130 Hp, was built on or after July 1, 2008, and does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter upon startup of your emergency engine.

60.4243 – What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?

(b) If you are the owner or operator of a stationary SI internal combustion engine and must comply with the emission standards specified in 60.4233(d) or (e), you must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) or (2) of this Section.

(1) purchasing an engine certified according to procedures specified in this Subpart, for the same model year and demonstrating compliance according to one of the methods specified in paragraph (a) of this section.

(2) purchasing a non-certified engine and demonstrating compliance with the emission standards specified in 60.4233(d) or (e) and according to the requirements specified in 60.4244, as applicable, and according to paragraphs (b)(2)(i) and (ii) of this Section.

(d) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted toward the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited.

60.4245 – What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?

(a) owners and operators of all stationary SI ICE must keep records of the information in paragraphs (a)(1) through (a)(4) of this section.

(1) all notifications submitted to comply with this Subpart and all documentation supporting any notification.

(2) maintenance conducted on the engine.

(3) if the stationary SI ICE is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable.

(b) For all stationary SI emergency ICE greater than 25 Hp and less than 130 Hp manufactured on or after July 1, 2008, that do not meet the standards applicable to non-emergency engines, the owner or operator must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

NESHAPS/MACT/GACT – The facility is classified as a Title III minor facility; therefore, applicability to the area source GACTs must be included in this permit renewal review. The Permittee operates equipment subject to the following area source GACTs.

1. One propane-fired emergency generator (36 Hp, 20 kW; **ID No. I-EG1**) is subject to 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This source is included on the list of insignificant activities because potential emissions of all criteria pollutants are each less than 5 tons per year

(based on converted million Btu per hour size – using DAQ LPG-fired combustion source emissions spreadsheet). According to the latest EPA spreadsheet summary, MACT compliance for this new (Date constructed – On or after **June 12, 2006**), emergency spark ignition, less than 500 Hp source located at an area source of HAP emissions is demonstrated by complying with the requirements of 40 CFR Part 60, Subpart JJJJ (spark ignition) as applicable and as described in the NSPS section above.

To address the cases where insignificant activities subject to a MACT or GACT have to be acknowledged in the permit as being applicable to the respective subpart, DAQ has created a new web page titled “Regulatory Guide for Insignificant/Permit Exempt Activities.” The link to this site is as follows:

<http://deq.nc.gov/about/divisions/air-quality/air-quality-permits/specific-permit-conditions-regulatory-guide>.

Asterisked language, including this link, has been added to the insignificant activities table of the renewed permit. Once the Permittee accesses this link he will be able to get the regulatory guide for the subject MACT/GACT, NSPS, and/or NCAC affected sources (in this case, the emergency generator).

2. Two natural gas/No. 6 fuel oil-fired boilers (29.3 million Btu per hour heat input each; **ID Nos. ES-4A and ES-4B**) is subject to 40 CFR 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers. These sources are categorized as existing oil-fired boilers. As such they are subject to the following requirements:

Subpart JJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

Note..Subpart JJJJJ applicability was evaluated during the issuance of the renewed Permit 05835T18. At that time 6J language was included in the permit and a thorough review of the applicability subpart was performed. Therefore, at this time the current language provided by Joe Voelker is being placed in the current renewed permit. This review engineer is not going into specifics of the applicability of the subpart (see review from issued permit 05835T18 for more details).

The following language has been added to the permit as Section 2.1 D.5:

5. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

Applicability [40 CFR 63.11193, 63.11194(a), (b), 63.11200(c)]

- a. *For this source(**ID Nos. ES-4A and ES-4B**), the Permittee shall comply with all applicable provisions, including the notification, testing, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .1111, “Maximum Achievable Control Technology” as promulgated in 40 CFR 63, Subpart JJJJJ, “National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers”, including Subpart A “General Provisions.”*

Definitions and Nomenclature

- b. *For the purposes of this permit condition, the definitions and nomenclature contained in 40 CFR 63.11237 shall apply.*

General Provisions [40 CFR 63.11235]

- c. *The Permittee shall comply with the General Provisions as applicable pursuant to Table 8 of 40 CFR 63 Subpart JJJJJ.*

Compliance Dates

- d. *The Permittee shall achieve compliance with the initial tune up and energy assessment requirements no later than March 21, 2014.*
 - i. *These requirements have been met on 12/2011.**[40 CFR 63.11196(a)(1), (a)(3), 63.11210(c)]*

Notification of Compliance Status [40 CFR 63.11225]

- e. *The Permittee shall submit a Notification of Compliance Status no later than July 19, 2014.*
 - i. *This requirement has been met on 07/16/2012.*

General Compliance Requirements [15A NCAC 02Q .0508(b)]

- f. *At all times the Permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.*

[40 CFR 63.11205(a)]

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if the requirements in condition f. are not met.

Performance Tune-up Requirements [15A NCAC 02Q .0508(b)]

- g. *The Permittee shall conduct an initial tune-up of the boiler and subsequent tune-ups biennially.*
 - i. *Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up.*
 - ii. *The Permittee shall conduct the tune-ups while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.*
 - iii. *The tune-ups shall be conducted according to the following procedures:*
 - A. *As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.*
 - B. *Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.*
 - C. *Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.*

- D. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- E. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- F. -If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

[40 CFR 63.11201(b), Table 2, 40 CFR 63.11223(a),(b)]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in condition g. are not met.

Energy Assessment Requirements [15A NCAC 02Q .0508(b)]

- h. The Permittee shall conduct a one-time energy assessment performed by a qualified energy assessor
 - i. This requirement was met on 10/21/2011.

[40 CFR 63.11201(b), Table 2]

Recordkeeping [15A NCAC 02Q .0508(f)]

- i. The Permittee shall maintain the following records:
 - i. As required in 40 CFR 63.10(b)(2)(xiv), the Permittee shall keep a copy of each notification and report that was submitted to comply with this rule and all documentation supporting any Notification of Compliance Status that was submitted.
 - ii. The Permittee shall keep the following records to document conformance with the performance tune-ups:
 - A. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
 - B. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
 - C. A description of any corrective actions taken as a part of the tune-up of the boiler.
 - D. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
 - iii. The Permittee shall keep a copy of each boiler energy assessment report.
 - iv. Records of the occurrence and duration of each malfunction of the boiler or of the associated air pollution control and monitoring equipment.
 - v. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in **condition f.**, including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- [40 CFR 63.11225(c), 63.11223(b)(6)]
- j. The records must be in a form suitable and readily available for expeditious review. The Permittee shall keep each record for 5 years following the date of each recorded action. The Permittee shall keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The Permittee may keep the records off site for the remaining 3 years.

[40 CFR 63.11225(d)]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in conditions i. and j. are not met.

Reporting [15A NCAC 2Q .0508(f)]

- k. *The reporting requirements of 40 CFR 63.11225(b) shall be met by complying with General Condition P of Section 3 of this permit.*

PSD – The Permittee operates two natural gas/No. 6 fuel oil-fired boilers (**ID Nos. ES-4A and ES-4B**) subject to a Prevention of Significant Deterioration avoidance limit of less than 250 tons sulfur dioxide combined. To ensure that this limit is not exceeded, the Permittee shall limit No. 6 fuel oil fired in these boilers to less than 1 million gallons per consecutive 12-month period. The Permittee is required to record monthly fuel usage and keep fuel certifications of sulfur content. Semi-annual reporting of the recordkeeping activities is also required. This permit renewal does not affect this status.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store one or more of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The following table indicates the current emission source/control device relationships:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-3	One tire sidewall grinding operation	CD-1	One RotoClone (61.6 cubic foot hopper capacity, American Air Filter RotoClone Type D Size 20)
ES-13	One tire retreading operation including: -Radial and bias tire buffing; -Dissolution application booth; -Tire building; -Curing presses; and -Touch-up paint	RD1	One simple cyclone (35 inches in diameter)

The following table outlines the specific permit conditions for each source/control device arrangement and if the control device is installed to comply with that requirement:

Emission Source ID No(s).	Control Device ID No(s).	Permit Condition(s)*	Control Equipment Installed to Meet Permit Limit?
ES-3	CD-1	15A NCAC 02D .0515	Particulate matter. Yes
ES-13	RD1	15A NCAC 02D .0515	Particulate matter. Yes

* The following permit conditions, where applicable, are not included in the CAM analysis:

1. 15A NCAC 02D .0521 – This regulation limits visible emissions to specific opacity levels based on equipment manufacture date. Visible emissions are not criteria pollutants subject to CAM analysis.
2. 15A NCAC 02D .1100 and 15A NCAC 2Q .0711– These regulations define State-enforceable emission limits for toxic air pollutants. These emission limits are not criteria pollutants subject to CAM analysis.
3. 15A NCAC 02D .0958 – This regulation defines work practices for sources of volatile organic compound emissions. Work practices are not emission limits subject to CAM analysis.

Tire sidewall grinding operation (ID No. ES-3): This source was reviewed for permit condition applicability during the first-time Title V permit (**05835T13**) process. At that time, the Permittee estimated uncontrolled potential particulate emissions based on confidential tire processing numbers and assumed all PM was PM₁₀ as follows:

$$(\# \text{ tires/year}) \times (\# \text{ lbs PM/tire}) = 19,962.8 \text{ pounds PM/yr (9.98 tons/yr)}$$

This estimate indicates that CAM is not applicable to this control device as the total is less than CAM applicability thresholds of 100 tons per year.

Tire retreading operation (ID No. ES-13): This source was reviewed for permit condition applicability during a minor modification (**05835T17**) process. At that time, the Permittee estimated uncontrolled potential particulate emissions based on confidential tire processing numbers as follows:

$$(\# \text{ tires/year retreaded}) \times (\# \text{ lbs PM/tire}) / 2000 \text{ pounds/ton} = 1,492.85 \text{ tons/yr}$$

This estimate indicates that CAM is applicable to this control device. However at the time of permit modification, the Permittee also provided results of a rubber size analysis completed for this source. That analysis indicated that there was no particulate less than 10 microns; indicating that CAM is not applicable to this control device. While reviewing this document prior to public notice, the Permittee acknowledged that it does not want to assume that the original rubber analysis is correct for CAM applicability because it was taken on a sample. They would prefer to use a conservative estimate and assume that at least 5% of the PM is PM₁₀ (based on process knowledge). This estimate equates to potential pre-control emissions of 74.64 tons per year. This conservative approach still indicates that CAM is not applicable to this control device.

VII. Facility Wide Air Toxics

The Permittee is subject to both source-specific modeled emission rates for benzene, 1,3-butadiene, cadmium, and nickel per 15A NCAC 02D .1100 and facility-wide toxic permit emission rates (TPERs) for acrolein, acrylonitrile, aniline, carbon disulfide, chlorobenzene, n-hexane, methylene chloride, phenol, styrene, toluene, vinyl chloride, and xylene per 15A NCAC 02Q .0711. To ensure compliance with the modeled emission rates for the source-specific limits, the Permittee shall record monthly the emission totals for each 12-month period ending on that month. No reporting is required for these two permit conditions. This permit renewal does not affect this status.

VIII. Facility Emissions Review

See Table above for a summary of the latest years actual emissions as reported to DAQ.

IX. Stipulation Review

The facility was last inspected by Matthew J. Wilson of the MRO on **January 7, 2016**. Based on his observations, the facility appeared to be in compliance with the applicable air quality regulations. He did not indicate any necessary permit language modifications.

X. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. The State of South Carolina and The Mecklenburg County Local Program are affected areas within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

MRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

RCO concurs with MRO's recommendation to issue the renewed air permit.